

# **EXHIBIT D**



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June 8, 2022

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**VIA ELECTRONIC MAIL**

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Christopher Lareau  
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**Re: Frost Control Systems, Inc. v. Patrick Baglien, Christopher Lareau and  
Vue Robotics LLC**

Dear Messrs. Baglien and Lareau,

We represent Frost Control Systems, Inc. d/b/a Frost Technologies ("Frost"). We write to address certain issues which have recently arisen and to demand compliance with your legal obligations.

As you know, Frost developed and sells the Advanced Infrared Monitoring System ("AIMS"), which is a fully-integrated, wireless, weather platform that empowers operators with the situational awareness needed to make real-time operational decisions. "AIMS provides operators with high-definition imagery, accurate weather atmospheric, forecasting, and pavement temperature. AIMS is accessible from anywhere via mobile web or desktop applications." <https://www.frostcontrols.com/product> (last visited June 7, 2022). Mr. Baglien was Frost's President until his employment terminated effective on or about October 20, 2021. Mr. Lareau was Frost's Vice President of Sales until his employment terminated effective on or about October 11, 2021. Mr. Lareau is party to a separation and mutual release agreement ("Agreement"), a copy of which you will find enclosed.

In their capacities as officers of Frost, both Mr. Baglien and Mr. Frost had full and complete access to confidential information and trade secrets belonging to Frost. That information includes, but is not limited to, information about product design and development, customer lists and purchasing history, business plans, marketing plans, financial information, pricing, operations, and active prospects.

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Frost learned just last week that Mr. Baglien and Mr. Lareau are Co-Founders and, respectively, CEO and COO, of Vue Robotics, LLC (“Vue”). Unbeknownst to Frost, Baglien and Lareau formed Vue on or about January 24, 2022 to compete against Frost. According to a press release issued on June 2, 2022, Vue “closed its pre-seed round and finished product development on its innovative weather security product, ARC1.” That product is strikingly similar to Frost’s AIMS product, and targets the same market.

As an initial matter, Frost demands that Mr. Baglien and Mr. Lareau immediately return each and every scrap of paper and bit of data which belong to Frost. That includes, without limitation, any and all information about Frost’s products, business, and customers. That means hard copy and electronic.

Make no mistake. If you worked on it or came into it while you were employed by Frost, it belongs to Frost.

We have evidence that Mr. Lareau, shortly before his exit from Frost, downloaded the entire list of Frost contacts from Hubspot. He also have evidence that Mr. Baglien, shortly before he left, downloaded Frost’s deal information from Hubspot. We are conducting an investigation to determine what else you took.

If you fail to comply with this demand, Frost will hold you accountable under, among other things, the federal Defend Trade Secrets Act and the Indiana Uniform Trade Secrets Act. Frost may seek injunctive relief, compensatory and exemplary damages, and attorney fees for your violations of these statutes.

Second, it appears that Mr. Lareau is in breach of his Agreement, and that Mr. Baglien tortiously interfered with that Agreement. Mr. Lareau covenanted not to compete with Frost until April 11, 2022. Mr. Lareau covenanted not to use or divulge Frost’s trade secrets indefinitely, and confidential information for one year. Frost reserves all rights to pursue legal action against Mr. Lareau for his violations of the Agreement, and against Mr. Baglien for his tortious interference, including injunctive relief, damages, and attorneys fees and costs. Frost’s determination whether to pursue such action will depend, in large part, on your cooperation in immediately returning all Frost confidential information and trade secrets in your possession, custody or control.

Finally, now that you are on notice of threatened litigation, you have a duty to maintain all documents and evidence related to this matter. That means that you must not delete, and must take proactive steps to preserve, all email communications, text messages, and other communications, as well as all other documents, related in any fashion to Frost and or Vue. If you fail to do so, you may be held liable for spoliation of evidence on top of everything else.

We look forward to your prompt response.

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Very truly yours,

ICE MILLER LLP

A handwritten signature in black ink, appearing to read "Adam Arceneaux", written in a cursive style.

Adam Arceneaux

AA/mlm; Enc.